IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS-WESTERN DIVISION

ROCKFORD PARK DISTRICT, an Illinois Unit of Local Government,) No. 1:08-cv-02676
Plaintiff,)
VS.	Judge: Philip G. ReinhardMagistrate: P. Michael Mahoney
TIG INSURANCE COMPANY, as	
successor by merger to INTERNATIONAL INSURANCE COMPANY, a foreign)
corporation,	
Defendant.)

MOTION FOR ENLARGEMENT OF TIME

Defendant TIG INSURANCE COMPANY, as successor by merger to INTER-NATIONAL INSURANCE COMPANY, a foreign corporation, ("TIG") by and through its undersigned attorneys, pursuant FED. R. CIV. P. 6 (b) requests an enlargement of time to file its responsive pleading to Plaintiff's Complaint, through and including May 30, 2008, and in support state as follows:

- (1) Upon information and belief, Plaintiff filed its complaint in the Circuit Court of the 17th Judicial Circuit, County of Winnebago on or around March 19, 2008;
- (2) Upon information or belief, Plaintiff placed its complaint for service via the Illinois Director of Insurance on or around April 28, 2008;
- (3) TIG was serviced by the Illinois Director of Insurance on May 7, 2008;
- (4) TIG removed this action to this Court on May 9, 2008;
- (5) Due to the removal of this action and the complexity of issues in Plaintiff's Complaint, TIG respectfully requests an enlargement of time in which to file its responsive pleading through and including May 30, 2008.

(6) Plaintiff will not be prejudiced by this extension and this brief enlargement will not unnecessarily delay this action.

WHEREFORE, TIG respectfully requests and enlargement of time, through and including May 30, 2008, in which to file or otherwise plead in response to Plaintiff's Complaint.

/s/ C. Kyle Lang

C. Kyle Lang #6280427 CLAUSEN MILLER P.C.

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Attorneys for Defendant TIG INSURANCE COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been electronically served upon the following counsel by on this 21st day of May, 2008.

Marc C. Gravino WILLIAMS MCCARTHY, LLP 120 West State Street P. O. Box 219 Rockford, IL 61105-0219 mgravino@wilmac.com Attorney for Plaintiff

> /s/ C. Kyle Lang Attorney